



OFFICE OF RIVER PROTECTION

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

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JAN 14 2015

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WA Dept of Health
Radioactive Air Emissions Section

15-ECD-0003

Mr. John Martell, Manager
Radioactive Air Emissions Section
Washington State Department of Health
309 Bradley Blvd., Suite 201
Richland, Washington 99352
(Hanford Mailstop: B1-42)

Mr. Martell:

U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SUBMITTAL TO THE WASHINGTON STATE DEPARTMENT OF HEALTH, LICENSE REVISION REQUESTS FOR 200W S-296S021-001 (296-S-21), 200E P-296A044-001 (296-A-44), 200E P-296A045-001 (296-A-45), 200E P-296A046-001 (296-A-46), AND 200E P-296A047-001 (296-A-47) CONTAINED IN THE HANFORD SITE AIR OPERATING PERMIT, PERMIT NUMBER 00-05-006, U.S. DEPARTMENT OF ENERGY HANFORD SITE RADIOACTIVE AIR EMISSIONS LICENSE NUMBER FF-01

Based on recent discussions with the Washington State Department of Health, the U.S. Department of Energy, Office of River Protection hereby submits to the Washington State Department of Health the following change forms:

- The License Revision Request for Emission Unit ID 254: 200W S-296S021-001 (296-S-21) (Attachment 1)
- Notification of Change not Requiring Permit Revision Form for Emission Unit 254 (Attachment 2)
- The License Revision Request for Emission Unit IDs 735: 200E P-296A044-001 (296-A-44), Emission Unit ID 736: 200E P-296A045-001 (296-A-45), Emission Unit ID 855: 200E P-296A046-001 (296-A-46), and Emission Unit ID 856: 200E P-296A047-001 (296-A-47) (Attachment 3)
- Notification of Change not Requiring Permit Revision Form for Emission Units 735, 736, 855, and 856 (Attachment 4).

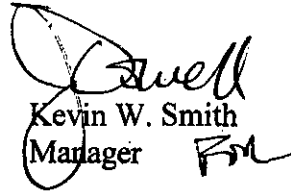
These change forms are necessary to align the sampling and analysis requirements for radionuclides with the potential to emit for emission unit. The U.S. Department of Energy, Office of River Protection has discussed these editorial changes to the FF-01 license with members of your staff in advance.

Mr. John Martell
15-ECD-0003

-2-

JAN 14 2015

If you have any questions, please contact Dennis W. Bowser, Environmental Compliance Division, (509) 373-2566.



Kevin W. Smith
Manager

ECD:DWB

Attachments: (4)

cc w/attachs:

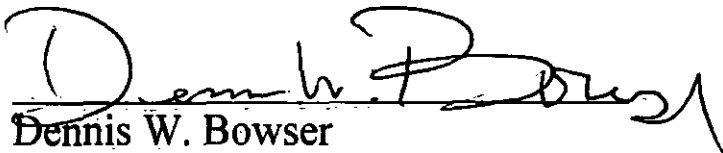
P.M. Gent, Ecology
R.A. Kaldor, MSA
R.J. Utley, WDOH
Environmental Portal, LMSI
WRPS Correspondence

cc w/o attachs:

B.G. Erlandson, BNI
J. Cox, CTUIR
S. Harris, CTUIR
S.L. Dahl, Ecology
D. Zhen, EPA (Region 10, Seattle)
G. Bohnee, NPT
K. Niles, Oregon Energy
D.E. Jackson, RL
J.W. Schmidt, WDOH
J.A. Joyner, WRPS
R. Jim, YN

Attachment 1
15-ECD-0003
(1 Page)

License/ALARACT Revision Request Form Emission Unit 254


Dennis W. Bowser

License / ALARACT Revision Request

NOTE: Any increase to abated or unabated PTE requires a full NOC modification.

Submittal Date: 11/20/2014

- License Revision
WDOH Condition Number: n/a
- ALARACT Revision
New ALARACT Rev. #: _____
- Report of Closure

PROJECT IDENTIFICATION

Project Title: License to Operate the 222-S Laboratory
Current NOC Application Number: n/a
WDOH EU ID Number: EU 254
Current WDOH Approval Letter Number(s): AIR 13-306
WDOH NOC ID Number: NOC ID 881

DESCRIPTION OF CHANGE

Number of Attachments: 0

WDOH will provide a new approval letter containing any new or modified conditions that result from the following proposed change.

Enter original and proposed wording here:

FF-01, Enclosure 1, EU ID 254, 200W S-296S021-001 (296-S-21), Monitoring Requirements:

Current:

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
40 CFR 61.93(b)(4)(i) & WAC 246-247-075(2)	40 CFR 61, Appendix B Method 114	Sr-90, Cs-137 and Pu-239	Continuous

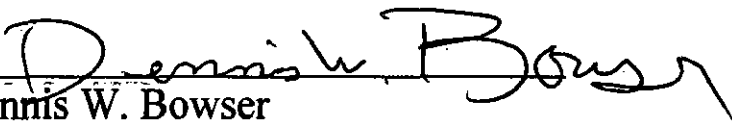
Change to:

Under "Radionuclides Requiring Measurement" column in table: Add Am-241

Basis: This isotope is >10% PTE per NOC application transmitted via letter 12-ECD-0055 dated October 25, 2012.

Attachment 2
15-ECD-0003
(1 Page)

Notification of Change not Requiring Permit Revision
Emission Unit 254


Dennis W. Bowser

NOTIFICATION OF CHANGE NOT REQUIRING PERMIT REVISION

Section 502(2)(10) Change*

This notification is provided to the Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as notice of a change not requiring permit revision described as follows.

- This change is allowed pursuant to WAC 173-401-722(1), WAC 173-401-722(2) and WAC 173-401-722(5):
1. Change is not a Title I modification.
 2. Change does not result in emissions that exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions.
 3. Change does not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit;
 4. Notification is proved to Ecology, WDOH, and EPA at least 7 days before making the change, and
 5. Change does not violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
 6. A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Permit Number: 00-05-006

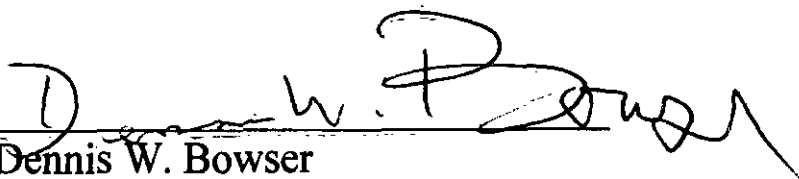
Provide the following information pursuant to WAC-173-401-722(2)(a):

Description of the change:
Make the following changes in FF-01, Enclosure 1: Add the following isotope to the 'Radionuclides Requiring Measurement' table: Am-241. <ul style="list-style-type: none">• Emission Unit 254, 296-S-21 Basis: This isotope is >10% PTE per NOC application transmitted via letter 12-ECD-0055 dated October 25, 2012.
Date of change:
When license revision becomes effective.
Describe the emissions resulting from the change:
There is no anticipated change to the emissions.
List any permit term or condition that will no longer be applicable as a result of the change:
n/a

* WAC 173-401-200(30) states that "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting or compliance certification requirements.

Attachment 3
15-ECD-0003
(5 Pages)

License/ALARACT Revision Request Form
Emission Units 735, 736, 855, and 856


Dennis W. Bowser

License / ALARACT Revision Request

NOTE: Any increase to abated or unabated PTE requires a full NOC modification.

Submittal Date: 11/20/2014

License Revision
WDOH Condition Number: 3

ALARACT Revision
New ALARACT Rev. #: _____

Report of Closure

PROJECT IDENTIFICATION

Project Title: Operation of New Ventilation Systems in AN and AW Tank Farms.
Current NOC Application Number: n/a
WDOH EU ID Number: EU 735, EU 736, EU 855, EU 856
Current WDOH Approval Letter Number(s): AIR 11-1004
WDOH NOC ID Number: NOC ID 809

DESCRIPTION OF CHANGE

Number of Attachments: 0

WDOH will provide a new approval letter containing any new or modified conditions that result from the following proposed change.

Enter original and proposed wording here:

CHANGE #1

Change applies to the following Emission Units in FF-01, Enclosure 1:

- EU ID 735, 200E P-296A044-001 (296-A-44), Monitoring Requirements:
- EU ID 736, 200E P-296A045-001 (296-A-45), Monitoring Requirements:
- EU ID 855, 200E P-296A046-001 (296-A-46), Monitoring Requirements:
- EU ID 856, 200E P-296A047-001 (296-A-47), Monitoring Requirements:

Current:

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
40 CFR 61.93(b)(4)(i) & WAC 246-247-075(2)	40 CFR 61, Appendix B, Method 114	Sr-90, Cs-137, Am-241, Y-90, Cs-134, Pa-231, Pu-238, Pu-239, Pu-240, Pu-241	Continuous

Change to:

Under "Radionuclides Requiring Measurement" column in table, remove the following isotopes: Y-90, Cs-134, Pa-231, Pu-238, Pu-239, Pu-240, Pu-241.

BASIS: Cs-137, Sr-90, and Am-241 are identified as >10% PTE dose to the MEI in Section 8.0 of the enclosure to ORP letter, 04-ED-028 "Approval of Radioactive Air Emissions Notices of Construction (NOC) For Operation of New Ventilations Systems in AN and AW Tank Farms" dated 3/23/2004.

CHANGE #2

Change applies to the following Emission Units in FF-01, Enclosure 1:

- EU ID 735, 200E P-296A044-001 (296-A-44), Condition #3:
- EU ID 736, 200E P-296A045-001 (296-A-45), Condition #3:

Current:

3) The Annual Possession Quantity is limited to the following radionuclides (Curies/year):

Ac - 227	1.30E+02	Am - 241	1.03E+05	Am - 243	1.37E+01
Ba - 137 m	1.75E+07	C - 14	5.07E+02	Cd - 113 m	7.50E+03
Cm - 242	7.57E+01	Cm - 243	8.35E+00	Cm - 244	2.36E+02
Co - 60	4.46E+03	Cs - 134	1.81E+04	Cs - 137	1.85E+07
Eu - 152	1.06E+03	Eu - 154	4.63E+04	Eu - 155	4.56E+04
H - 3	2.71E+03	I - 129	9.18E+00	Nb - 93 m	1.82E+03
Ni - 59	7.70E+02	Ni - 63	7.26E+04	Np - 237	6.20E+01
Pa - 231	2.70E+02	Pu - 238	3.04E+03	Pu - 239	2.92E+04
Pu - 240	5.25E+03	Pu - 241	6.40E+04	Pu - 242	4.05E-01
Ra - 226	2.38E+02	Ra - 228	3.87E+01	Ru - 106	1.02E+03
Sb - 125	2.06E+04	Se - 79	5.70E+01	Sm - 151	1.53E+06
Sn - 126	2.40E+02	Sr - 90	2.30E+07	Tc - 99	6.89E+03
Th - 229	2.49E+01	Th - 232	6.16E+00	U - 232	2.79E+01
U - 233	4.48E+02	U - 234	6.76E+01	U - 235	2.58E+00
U - 236	2.87E+00	U - 238	5.61E+01	Y - 90	2.30E+07
Zr - 93	1.86E+03				

Change to:

3) The Annual Possession Quantity is limited to the following radionuclides (Curies/year):

Ac - 227
Contributes less than 10% of the unabated PTE

Ba - 137 m
Contributes less than 10% of the unabated PTE

Cm - 242
Contributes less than 10% of the unabated PTE

Co - 60
Contributes less than 10% of the unabated PTE

Eu - 152
Contributes less than 10% of the unabated PTE

H - 3
Contributes less than 10% of the unabated PTE

Ni - 59
Contributes less than 10% of the unabated PTE

Pa - 231
Contributes less than 10% of the unabated PTE

Pu - 240
Contributes less than 10% of the unabated PTE

Ra - 226
Contributes less than 10% of the unabated PTE

Sb - 125
Contributes less than 10% of the unabated PTE

Sn - 126
Contributes less than 10% of the unabated PTE

Th - 229
Contributes less than 10% of the unabated PTE

U - 233
Contributes less than 10% of the unabated PTE

U - 236
Contributes less than 10% of the unabated PTE

Zr - 93
Contributes less than 10% of the unabated PTE

Am - 241 1.03E+05
Identified as contributing GREATER than 10% of the potential TEDE to the MEI

C - 14
Contributes less than 10% of the unabated PTE

Cm - 243
Contributes less than 10% of the unabated PTE

Cs - 134
Contributes less than 10% of the unabated PTE

Eu - 154
Contributes less than 10% of the unabated PTE

I - 129
Contributes less than 10% of the unabated PTE

Ni - 63
Contributes less than 10% of the unabated PTE

Pu - 238
Contributes less than 10% of the unabated PTE

Pu - 241
Contributes less than 10% of the unabated PTE

Ra - 228
Contributes less than 10% of the unabated PTE

Se - 79
Contributes less than 10% of the unabated PTE

Sr - 90 2.30E+07
Identified as contributing GREATER than 10% of the potential TEDE to the MEI

Th - 232
Contributes less than 10% of the unabated PTE

U - 234
Contributes less than 10% of the unabated PTE

U - 238
Contributes less than 10% of the unabated PTE

Am - 243
Contributes less than 10% of the unabated PTE

Cd - 113 m
Contributes less than 10% of the unabated PTE

Cm - 244
Contributes less than 10% of the unabated PTE

Cs - 137 1.85E+07
Identified as contributing GREATER than 10% of the potential TEDE to the MEI

Eu - 155
Contributes less than 10% of the unabated PTE

Nb - 93 m
Contributes less than 10% of the unabated PTE

Np - 237
Contributes less than 10% of the unabated PTE

Pu - 239
Contributes less than 10% of the unabated PTE

Pu - 242
Contributes less than 10% of the unabated PTE

Ru - 106
Contributes less than 10% of the unabated PTE

Sm - 151
Contributes less than 10% of the unabated PTE

Tc - 99
Contributes less than 10% of the unabated PTE

U - 232
Contributes less than 10% of the unabated PTE

U - 235
Contributes less than 10% of the unabated PTE

Y - 90
Contributes less than 10% of the unabated PTE

BASIS: Cs-137, Sr-90, and Am-241 are identified as >10% PTE dose to the MEI in Section 8.0 of the enclosure to ORP letter, 04-ED-028 "Approval of Radioactive Air Emissions Notices of Construction (NOC) For Operation of New Ventilations Systems in AN and AW Tank Farms" dated 3/23/2004. The values are taken from Table 3 of the enclosure to ORP letter, 04-ED-028.

CHANGE #3

Change applies to the following Emission Units in FF-01, Enclosure 1:

- EU ID 855, 200E P-296A046-001 (296-A-46), Condition #3:
- EU ID 856, 200E P-296A047-001 (296-A-47), Condition #3:

Current:

3) The Annual Possession Quantity is limited to the following radionuclides (Curies/year):

Ac - 227	1.29E+02	Am - 241	9.67E+04	Am - 243	1.34E+01
Ba - 137 m	1.61E+07	C - 14	4.38E+02	Cd - 113 m	7.25E+03
Cm - 242	6.99E+01	Cm - 243	7.92E+00	Cm - 244	2.25E+02
Co - 60	4.13E+03	Cs - 134	1.08E+04	Cs - 137	1.70E+07
Eu - 152	1.01E+03	Eu - 154	4.26E+04	Eu - 155	4.42E+04
H - 3	2.47E+03	I - 129	8.13E+00	Nb - 93 m	1.77E+03
Ni - 59	7.44E+02	Ni - 63	7.02E+04	Np - 237	5.18E+01
Pa - 231	2.70E+02	Pu - 238	2.59E+03	Pu - 239	2.71E+04
Pu - 240	4.86E+03	Pu - 241	6.00E+04	Pu - 242	3.77E+01
Ra - 226	2.38E+02	Ra - 228	3.65E+01	Ru - 106	1.02E+03
Sb - 125	2.04E+04	Se - 79	5.38E+01	Sm - 151	1.48E+06
Sn - 126	2.21E+02	Sr - 90	2.08E+07	Tc - 99	6.09E+03
Th - 229	2.49E+01	Th - 232	6.08E+00	U - 232	2.73E+01
U - 233	4.46E+02	U - 234	6.14E+01	U - 235	2.34E+00
U - 236	2.73E+00	U - 238	5.06E+01	Y - 90	2.08E+07
Zr - 93	1.80E+03				

Change to:

3) The Annual Possession Quantity is limited to the following radionuclides (Curies/year):

Ac - 227 Contributes less than 10% of the unabated PTE	Am - 241 Identified as contributing GREATER than 10% of the potential TEDE to the MEI	9.67E+04	Am - 243 Contributes less than 10% of the unabated PTE
Ba - 137 m Contributes less than 10% of the unabated PTE	C - 14 Contributes less than 10% of the unabated PTE		Cd - 113 m Contributes less than 10% of the unabated PTE

Cm - 242
Contributes less than 10% of the unabated PTE

Co - 60
Contributes less than 10% of the unabated PTE

Eu - 152
Contributes less than 10% of the unabated PTE

H - 3
Contributes less than 10% of the unabated PTE

Ni - 59
Contributes less than 10% of the unabated PTE

Pa - 231
Contributes less than 10% of the unabated PTE

Pu - 240
Contributes less than 10% of the unabated PTE

Ra - 226
Contributes less than 10% of the unabated PTE

Sb - 125
Contributes less than 10% of the unabated PTE

Sn - 126
Contributes less than 10% of the unabated PTE

Th - 229
Contributes less than 10% of the unabated PTE

U - 233
Contributes less than 10% of the unabated PTE

U - 236
Contributes less than 10% of the unabated PTE

Zr - 93
Contributes less than 10% of the unabated PTE

Cm - 243
Contributes less than 10% of the unabated PTE

Cs - 134
Contributes less than 10% of the unabated PTE

Eu - 154
Contributes less than 10% of the unabated PTE

I - 129
Contributes less than 10% of the unabated PTE

Ni - 63
Contributes less than 10% of the unabated PTE

Pu - 238
Contributes less than 10% of the unabated PTE

Pu - 241
Contributes less than 10% of the unabated PTE

Ra - 228
Contributes less than 10% of the unabated PTE

Se - 79
Contributes less than 10% of the unabated PTE

Sr - 90 2.08E+07
Identified as contributing GREATER than 10% of the potential TEDE to the MEI

Th - 232
Contributes less than 10% of the unabated PTE

U - 234
Contributes less than 10% of the unabated PTE

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Contributes less than 10% of the unabated PTE

Cm - 244
Contributes less than 10% of the unabated PTE

Cs - 137 1.70E+07
Identified as contributing GREATER than 10% of the potential TEDE to the MEI

Eu - 155
Contributes less than 10% of the unabated PTE

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Ru - 106
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Sm - 151
Contributes less than 10% of the unabated PTE

Tc - 99
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Contributes less than 10% of the unabated PTE

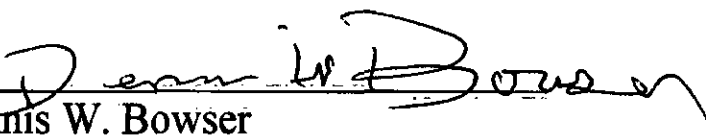
U - 235
Contributes less than 10% of the unabated PTE

Y - 90
Contributes less than 10% of the unabated PTE

BASIS: Cs-137, Sr-90, and Am-241 are identified as >10% PTE dose to the MEI in Section 8.0 of the enclosure to ORP letter, 04-ED-028 "Approval of Radioactive Air Emissions Notices of Construction (NOC) For Operation of New Ventilations Systems in AN and AW Tank Farms" dated 3/23/2004. The values are taken from Table 4 of the enclosure to ORP letter, 04-ED-028.

Attachment 4
15-ECD-0003
(1 Page)

Notification of Change not Requiring Permit Revision
Emission Units 735, 736, 855, and 856


Dennis W. Bowser

NOTIFICATION OF CHANGE NOT REQUIRING PERMIT REVISION

Section 502(2)(10) Change*

This notification is provided to the Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as notice of a change not requiring permit revision described as follows.

This change is allowed pursuant to WAC 173-401-722(1), WAC 173-401-722(2) and WAC 173-401-722(5):

1. Change is not a Title I modification.
2. Change does not result in emissions that exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions.
3. Change does not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit;
4. Notification is proved to Ecology, WDOH, and EPA at least 7 days before making the change, and
5. Change does not violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
6. A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Permit Number: 00-05-006

Provide the following information pursuant to WAC-173-401-722(2)(a):

Description of the change:

Make the following two changes in FF-01, Enclosure 1 for the following emission units:

- Emission Unit 735, 296-A-44
- Emission Unit 736, 296-A-45
- Emission Unit 855, 296-A-46
- Emission Unit 856, 296-A-47

Change #1. Remove the following isotopes from the 'Radionuclides Requiring Measurement' table: Y-90, Cs-134, Pa-231, Pu-238, Pu-239, Pu-240, Pu-241.

Change #2. For Emission Unit 735, 296-A-44, and Emission Unit 736, 296-A-45, replace Condition #3 list of radionuclides and associated Annual Possession Quantities with the list provided in the License/ALARACT Revision Request Form.

Change #3. For Emission Unit 855, 296-A-46, and Emission Unit 856, 296-A-47, replace Condition #3 list of radionuclides and associated Annual Possession Quantities with the list provided in the License/ALARACT Revision Request Form.

Basis for both changes: Cs137, Sr90, and Am241 are identified as >10% PTE dose to the MEI in 04-ED-028 "Approval of Radioactive Air Emissions Notices of Construction (NOC) For Operation of New Ventilations Systems in AN and AW Tank Farms" dated 3/23/2004.

Date of change:

When license revision becomes effective.

Describe the emissions resulting from the change:

There is no anticipated change to the emissions.

List any permit term or condition that will no longer be applicable as a result of the change:

n/a

* WAC 173-401-200(30) states that "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting or compliance certification requirements.

IM# 8,388



OFFICE OF RIVER PROTECTION

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

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WA Dept of Health
Radioactive Air Emissions Section

15-ECD-0003

Mr. John Martell, Manager
Radioactive Air Emissions Section
Washington State Department of Health
309 Bradley Blvd., Suite 201
Richland, Washington 99352
(Hanford Mailstop: B1-42)

Mr. Martell:

U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SUBMITTAL TO THE WASHINGTON STATE DEPARTMENT OF HEALTH, LICENSE REVISION REQUESTS FOR 200W S-296S021-001 (296-S-21), 200E P-296A044-001 (296-A-44), 200E P-296A045-001 (296-A-45), 200E P-296A046-001 (296-A-46), AND 200E P-296A047-001 (296-A-47) CONTAINED IN THE HANFORD SITE AIR OPERATING PERMIT, PERMIT NUMBER 00-05-006, U.S. DEPARTMENT OF ENERGY HANFORD SITE RADIOACTIVE AIR EMISSIONS LICENSE NUMBER FF-01

Based on recent discussions with the Washington State Department of Health, the U.S. Department of Energy, Office of River Protection hereby submits to the Washington State Department of Health the following change forms:

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These change forms are necessary to align the sampling and analysis requirements for radionuclides with the potential to emit for emission unit. The U.S. Department of Energy, Office of River Protection has discussed these editorial changes to the FF-01 license with members of your staff in advance.

NOC 881,809

Eu 254, 735, 736, 855, 856


Mr. John Martell
15-ECD-0003

-2-

JAN 14 2015

If you have any questions, please contact Dennis W. Bowser, Environmental Compliance Division, (509) 373-2566.

ECD:DWB


Kevin W. Smith
Manager *KS*

Attachments: (4)

cc w/attachs:

P.M. Gent, Ecology

R.A. Kaldor, MSA

R.J. Utley, WDOH

Environmental Portal, LMSI

WRPS Correspondence

cc w/o attachs:

B.G. Erlandson, BNI

J. Cox, CTUIR

S. Harris, CTUIR

S.L. Dahl, Ecology

D. Zhen, EPA (Region 10, Seattle)

G. Bohnee, NPT

K. Niles, Oregon Energy

D.E. Jackson, RL

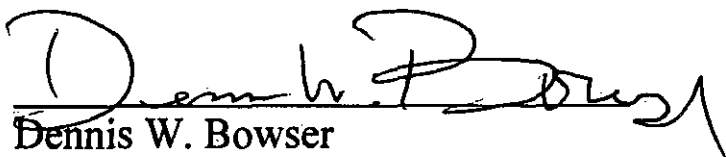
J.W. Schmidt, WDOH

J.A. Joyner, WRPS

R. Jim, YN

Attachment 1
15-ECD-0003
(1 Page)

License/ALARACT Revision Request Form Emission Unit 254


Dennis W. Bowser

License / ALARACT Revision Request

NOTE: Any increase to abated or unabated PTE requires a full NOC modification.

Submittal Date: 11/20/2014

- License Revision
WDOH Condition Number: n/a
- ALARACT Revision
New ALARACT Rev. #: _____
- Report of Closure

PROJECT IDENTIFICATION

Project Title: License to Operate the 222-S Laboratory
Current NOC Application Number: n/a
WDOH EU ID Number: EU 254
Current WDOH Approval Letter Number(s): AIR 13-306
WDOH NOC ID Number: NOC ID:881

DESCRIPTION OF CHANGE

Number of Attachments: 0

WDOH will provide a new approval letter containing any new or modified conditions that result from the following proposed change.

Enter original and proposed wording here:

FF-01, Enclosure 1, EU ID 254, 200W S-296S021-001 (296-S-21), Monitoring Requirements:

Current:

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
40 CFR 61.93(b)(4)(i) & WAC 246-247-075(2)	40 CFR 61, Appendix B Method 114	Sr-90, Cs-137 and Pu-239	Continuous

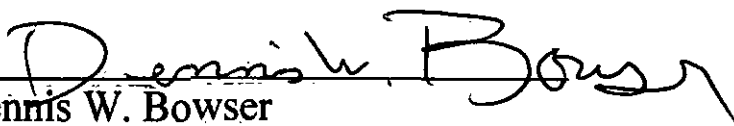
Change to:

Under "Radionuclides Requiring Measurement" column in table: Add Am-241

Basis: This isotope is >10% PTE per NOC application transmitted via letter 12-ECD-0055 dated October 25, 2012.

Attachment 2
15-ECD-0003
(1 Page)

Notification of Change not Requiring Permit Revision
Emission Unit 254


Dennis W. Bowser

NOTIFICATION OF CHANGE NOT REQUIRING PERMIT REVISION

Section 502(2)(10) Change*

This notification is provided to the Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as notice of a change not requiring permit revision described as follows.

- This change is allowed pursuant to WAC 173-401-722(1), WAC 173-401-722(2) and WAC 173-401-722(5):
1. Change is not a Title I modification.
 2. Change does not result in emissions that exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions.
 3. Change does not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit;
 4. Notification is proved to Ecology, WDOH, and EPA at least 7 days before making the change, and
 5. Change does not violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
 6. A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Permit Number: 00-05-006

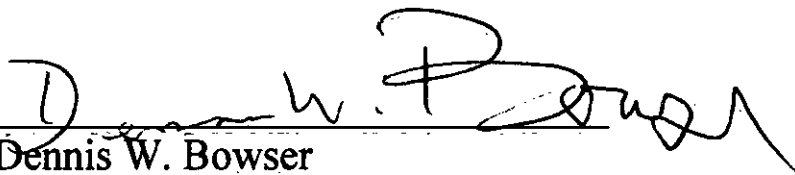
Provide the following information pursuant to WAC-173-401-722(2)(a):

Description of the change: Make the following changes in FF-01, Enclosure 1: Add the following isotope to the 'Radionuclides Requiring Measurement' table: Am-241. <ul style="list-style-type: none">• Emission Unit 254, 296-S-21 Basis: This isotope is >10% PTE per NOC application transmitted via letter 12-ECD-0055 dated October 25, 2012.
Date of change: When license revision becomes effective.
Describe the emissions resulting from the change: There is no anticipated change to the emissions.
List any permit term or condition that will no longer be applicable as a result of the change: n/a

* WAC 173-401-200(30) states that "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting or compliance certification requirements.

Attachment 3
15-ECD-0003
(5 Pages)

License/ALARACT Revision Request Form
Emission Units 735, 736, 855, and 856


Dennis W. Bowser

License / ALARACT Revision Request

NOTE: Any increase to abated or unabated PTE requires a full NOC modification.

Submittal Date: 11/20/2014

License Revision
WDOH Condition Number: 3

ALARACT Revision
New ALARACT Rev. #: _____

Report of Closure

PROJECT IDENTIFICATION

Project Title: Operation of New Ventilation Systems in AN and AW Tank Farms.
Current NOC Application Number: n/a
WDOH EU ID Number: EU 735, EU 736, EU 855, EU 856
Current WDOH Approval Letter Number(s): AIR 11-1004
WDOH NOC ID Number: NOC ID 809

DESCRIPTION OF CHANGE

Number of Attachments: 0

WDOH will provide a new approval letter containing any new or modified conditions that result from the following proposed change.

Enter original and proposed wording here:

CHANGE #1

Change applies to the following Emission Units in FF-01, Enclosure 1:

- EU ID 735, 200E P-296A044-001 (296-A-44), Monitoring Requirements:
- EU ID 736, 200E P-296A045-001 (296-A-45), Monitoring Requirements:
- EU ID 855, 200E P-296A046-001 (296-A-46), Monitoring Requirements:
- EU ID 856, 200E P-296A047-001 (296-A-47), Monitoring Requirements:

Current:

<u>Federal and State Regulatory</u>	<u>Monitoring and Testing Requirements</u>	<u>Radionuclides Requiring Measurement</u>	<u>Sampling Frequency</u>
40 CFR 61.93(b)(4)(i) & WAC 246-247-075(2)	40 CFR 61, Appendix B, Method 114	Sr-90, Cs-137, Am-241, Y- 90, Cs-134, Pa-231, Pu-238, Pu-239, Pu-240, Pu-241	Continuous

Change to:

Under "Radionuclides Requiring Measurement" column in table, remove the following isotopes: Y-90, Cs-134, Pa-231, Pu-238, Pu-239, Pu-240, Pu-241.

BASIS: Cs-137, Sr-90, and Am-241 are identified as >10% PTE dose to the MEI in Section 8.0 of the enclosure to ORP letter, 04-ED-028 "Approval of Radioactive Air Emissions Notices of Construction (NOC) For Operation of New Ventilations Systems in AN and AW Tank Farms" dated 3/23/2004.

CHANGE #2

Change applies to the following Emission Units in FF-01, Enclosure 1:

- EU ID 735, 200E P-296A044-001 (296-A-44), Condition #3:
- EU ID 736, 200E P-296A045-001 (296-A-45), Condition #3:

Current:

3) The Annual Possession Quantity is limited to the following radionuclides (Curies/year):

Ac - 227	1.30E+02	Am - 241	1.03E+05	Am - 243	1.37E+01
Ba - 137 m	1.75E+07	C - 14	5.07E+02	Cd - 113 m	7.50E+03
Cm - 242	7.57E+01	Cm - 243	8.35E+00	Cm - 244	2.36E+02
Co - 60	4.46E+03	Cs - 134	1.81E+04	Cs - 137	1.85E+07
Eu - 152	1.06E+03	Eu - 154	4.63E+04	Eu - 155	4.56E+04
H - 3	2.71E+03	I - 129	9.18E+00	Nb - 93 m	1.82E+03
Ni - 59	7.70E+02	Ni - 63	7.26E+04	Np - 237	6.20E+01
Pa - 231	2.70E+02	Pu - 238	3.04E+03	Pu - 239	2.92E+04
Pu - 240	5.25E+03	Pu - 241	6.40E+04	Pu - 242	4.05E-01
Ra - 226	2.38E+02	Ra - 228	3.87E+01	Ru - 106	1.02E+03
Sb - 125	2.06E+04	Se - 79	5.70E+01	Sm - 151	1.53E+06
Sn - 126	2.40E+02	Sr - 90	2.30E+07	Tc - 99	6.89E+03
Th - 229	2.49E+01	Th - 232	6.16E+00	U - 232	2.79E+01
U - 233	4.48E+02	U - 234	6.76E+01	U - 235	2.58E+00
U - 236	2.87E+00	U - 238	5.61E+01	Y - 90	2.30E+07
Zr - 93	1.86E+03				

Change to:

3) The Annual Possession Quantity is limited to the following radionuclides (Curies/year):

Ac - 227
Contributes less than 10% of the unabated PTE

Ba - 137 m
Contributes less than 10% of the unabated PTE

Cm - 242
Contributes less than 10% of the unabated PTE

Co - 60
Contributes less than 10% of the unabated PTE

Eu - 152
Contributes less than 10% of the unabated PTE

H - 3
Contributes less than 10% of the unabated PTE

Ni - 59
Contributes less than 10% of the unabated PTE

Pa - 231
Contributes less than 10% of the unabated PTE

Pu - 240
Contributes less than 10% of the unabated PTE

Ra - 226
Contributes less than 10% of the unabated PTE

Sb - 125
Contributes less than 10% of the unabated PTE

Sn - 126
Contributes less than 10% of the unabated PTE

Th - 229
Contributes less than 10% of the unabated PTE

U - 233
Contributes less than 10% of the unabated PTE

U - 236
Contributes less than 10% of the unabated PTE

Zr - 93
Contributes less than 10% of the unabated PTE

Am - 241 1.03E+05
Identified as contributing GREATER than 10% of the potential TEDE to the MEI

C - 14
Contributes less than 10% of the unabated PTE

Cm - 243
Contributes less than 10% of the unabated PTE

Cs - 134
Contributes less than 10% of the unabated PTE

Eu - 154
Contributes less than 10% of the unabated PTE

I - 129
Contributes less than 10% of the unabated PTE

Ni - 63
Contributes less than 10% of the unabated PTE

Pu - 238
Contributes less than 10% of the unabated PTE

Pu - 241
Contributes less than 10% of the unabated PTE

Ra - 228
Contributes less than 10% of the unabated PTE

Se - 79
Contributes less than 10% of the unabated PTE

Sr - 90 2.30E+07
Identified as contributing GREATER than 10% of the potential TEDE to the MEI

Th - 232
Contributes less than 10% of the unabated PTE

U - 234
Contributes less than 10% of the unabated PTE

U - 238
Contributes less than 10% of the unabated PTE

Am - 243
Contributes less than 10% of the unabated PTE

Cd - 113 m
Contributes less than 10% of the unabated PTE

Cm - 244
Contributes less than 10% of the unabated PTE

Cs - 137 1.85E+07
Identified as contributing GREATER than 10% of the potential TEDE to the MEI

Eu - 155
Contributes less than 10% of the unabated PTE

Nb - 93 m
Contributes less than 10% of the unabated PTE

Np - 237
Contributes less than 10% of the unabated PTE

Pu - 239
Contributes less than 10% of the unabated PTE

Pu - 242
Contributes less than 10% of the unabated PTE

Ru - 106
Contributes less than 10% of the unabated PTE

Sr - 151
Contributes less than 10% of the unabated PTE

Tc - 99
Contributes less than 10% of the unabated PTE

U - 232
Contributes less than 10% of the unabated PTE

U - 235
Contributes less than 10% of the unabated PTE

Y - 90
Contributes less than 10% of the unabated PTE

BASIS: Cs-137, Sr-90, and Am-241 are identified as >10% PTE dose to the MEI in Section 8.0 of the enclosure to ORP letter, 04-ED-028 "Approval of Radioactive Air Emissions Notices of Construction (NOC) For Operation of New Ventilations Systems in AN and AW Tank Farms" dated 3/23/2004. The values are taken from Table 3 of the enclosure to ORP letter, 04-ED-028.

CHANGE #3

Change applies to the following Emission Units in FF-01, Enclosure 1:

- EU ID 855, 200E P-296A046-001 (296-A-46), Condition #3:
- EU ID 856, 200E P-296A047-001 (296-A-47), Condition #3:

Current:

3) The Annual Possession Quantity is limited to the following radionuclides (Curies/year):

Ac - 227	1.29E+02	Am - 241	9.67E+04	Am - 243	1.34E+01
Ba - 137 m	1.61E+07	C - 14	4.38E+02	Cd - 113 m	7.25E+03
Cm - 242	6.99E+01	Cm - 243	7.92E+00	Cm - 244	2.25E+02
Co - 60	4.13E+03	Cs - 134	1.08E+04	Cs - 137	1.70E+07
Eu - 152	1.01E+03	Eu - 154	4.26E+04	Eu - 155	4.42E+04
H - 3	2.47E+03	I - 129	8.13E+00	Nb - 93 m	1.77E+03
Ni - 59	7.44E+02	Ni - 63	7.02E+04	Np - 237	5.18E+01
Pa - 231	2.70E+02	Pu - 238	2.59E+03	Pu - 239	2.71E+04
Pu - 240	4.86E+03	Pu - 241	6.00E+04	Pu - 242	3.77E-01
Ra - 226	2.38E+02	Ra - 228	3.65E+01	Ru - 106	1.02E+03
Sb - 125	2.04E+04	Se - 79	5.38E+01	Sm - 151	1.48E+06
Sn - 126	2.21E+02	Sr - 90	2.08E+07	Tc - 99	6.09E+03
Th - 229	2.49E+01	Th - 232	6.08E+00	U - 232	2.73E+01
U - 233	4.46E+02	U - 234	6.14E+01	U - 235	2.34E+00
U - 236	2.73E+00	U - 238	5.06E+01	Y - 90	2.08E+07
Zr - 93	1.80E+03				

Change to:

3) The Annual Possession Quantity is limited to the following radionuclides (Curies/year):

Ac - 227 Contributes less than 10% of the unabated PTE	Am - 241 Identified as contributing GREATER than 10% of the potential TEDE to the MEI	9.67E+04	Am - 243 Contributes less than 10% of the unabated PTE
Ba - 137 m Contributes less than 10% of the unabated PTE	C - 14 Contributes less than 10% of the unabated PTE		Cd - 113 m Contributes less than 10% of the unabated PTE

Cm - 242
Contributes less than 10% of the unabated PTE

Co - 60
Contributes less than 10% of the unabated PTE

Eu - 152
Contributes less than 10% of the unabated PTE

H - 3
Contributes less than 10% of the unabated PTE

Ni - 59
Contributes less than 10% of the unabated PTE

Pa - 231
Contributes less than 10% of the unabated PTE

Pu - 240
Contributes less than 10% of the unabated PTE

Ra - 226
Contributes less than 10% of the unabated PTE

Sb - 125
Contributes less than 10% of the unabated PTE

Sn - 126
Contributes less than 10% of the unabated PTE

Th - 229
Contributes less than 10% of the unabated PTE

U - 233
Contributes less than 10% of the unabated PTE

U - 236
Contributes less than 10% of the unabated PTE

Zr - 93
Contributes less than 10% of the unabated PTE

Cm - 243
Contributes less than 10% of the unabated PTE

Cs - 134
Contributes less than 10% of the unabated PTE

Eu - 154
Contributes less than 10% of the unabated PTE

I - 129
Contributes less than 10% of the unabated PTE

Ni - 63
Contributes less than 10% of the unabated PTE

Pu - 238
Contributes less than 10% of the unabated PTE

Pu - 241
Contributes less than 10% of the unabated PTE

Ra - 228
Contributes less than 10% of the unabated PTE

Se - 79
Contributes less than 10% of the unabated PTE

Sr - 90 2.08E+07
Identified as contributing GREATER than 10% of the potential TEDE to the MEI

Th - 232
Contributes less than 10% of the unabated PTE

U - 234
Contributes less than 10% of the unabated PTE

U - 238
Contributes less than 10% of the unabated PTE

Cm - 244
Contributes less than 10% of the unabated PTE

Cs - 137 1.70E+07
Identified as contributing GREATER than 10% of the potential TEDE to the MEI

Eu - 155
Contributes less than 10% of the unabated PTE

Nb - 93 m
Contributes less than 10% of the unabated PTE

Np - 237
Contributes less than 10% of the unabated PTE

Pu - 239
Contributes less than 10% of the unabated PTE

Pu - 242
Contributes less than 10% of the unabated PTE

Ru - 106
Contributes less than 10% of the unabated PTE

Sm - 151
Contributes less than 10% of the unabated PTE

Tc - 99
Contributes less than 10% of the unabated PTE

U - 232
Contributes less than 10% of the unabated PTE

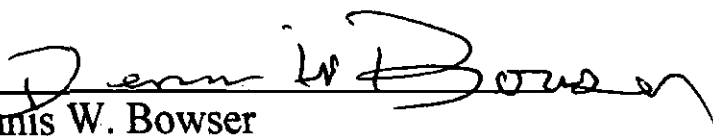
U - 235
Contributes less than 10% of the unabated PTE

Y - 90
Contributes less than 10% of the unabated PTE

BASIS: Cs-137, Sr-90, and Am-241 are identified as >10% PTE dose to the MEI in Section 8.0 of the enclosure to ORP letter, 04-ED-028 "Approval of Radioactive Air Emissions Notices of Construction (NOC) For Operation of New Ventilations Systems in AN and AW Tank Farms" dated 3/23/2004. The values are taken from Table 4 of the enclosure to ORP letter, 04-ED-028.

Attachment 4
15-ECD-0003
(1 Page)

Notification of Change not Requiring Permit Revision
Emission Units 735, 736, 855, and 856


Dennis W. Bowser

NOTIFICATION OF CHANGE NOT REQUIRING PERMIT REVISION

Section 502(2)(10) Change*

This notification is provided to the Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as notice of a change not requiring permit revision described as follows.

- This change is allowed pursuant to WAC 173-401-722(1), WAC 173-401-722(2) and WAC 173-401-722(5):
1. Change is not a Title I modification.
 2. Change does not result in emissions that exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions.
 3. Change does not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit;
 4. Notification is proved to Ecology, WDOH, and EPA at least 7 days before making the change, and
 5. Change does not violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
 6. A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Permit Number: 00-05-006

Provide the following information pursuant to WAC-173-401-722(2)(a):

Description of the change:
Make the following two changes in FF-01, Enclosure 1 for the following emission units: <ul style="list-style-type: none">• Emission Unit 735, 296-A-44• Emission Unit 736, 296-A-45• Emission Unit 855, 296-A-46• Emission Unit 856, 296-A-47
Change #1. Remove the following isotopes from the 'Radionuclides Requiring Measurement' table: Y-90, Cs-134, Pa-231, Pu-238, Pu-239, Pu-240, Pu-241.
Change #2. For Emission Unit 735, 296-A-44, and Emission Unit 736, 296-A-45, replace Condition #3 list of radionuclides and associated Annual Possession Quantities with the list provided in the License/ALARACT Revision Request Form.
Change #3. For Emission Unit 855, 296-A-46, and Emission Unit 856, 296-A-47, replace Condition #3 list of radionuclides and associated Annual Possession Quantities with the list provided in the License/ALARACT Revision Request Form.
Basis for both changes: Cs137, Sr90, and Am241 are identified as >10% PTE dose to the MEI in 04-ED-028 "Approval of Radioactive Air Emissions Notices of Construction (NOC) For Operation of New Ventilations Systems in AN and AW Tank Farms" dated 3/23/2004.
Date of change:
When license revision becomes effective.
Describe the emissions resulting from the change:
There is no anticipated change to the emissions.
List any permit term or condition that will no longer be applicable as a result of the change:
n/a

* WAC 173-401-200(30) states that "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting or compliance certification requirements.